

## Scope of Crimes Associated with IUU Fishing Activities

A number of crimes are associated with IUU fishing activities. Some are directly related to the fisheries supply chain, such as environmental crimes, document fraud, corruption, tax evasion, forced labor, illicit trade, or food fraud. Other crimes not directly related to fishing may be committed by fishing vessels and fishers, such as human trafficking or human smuggling, and drug and contraband smuggling.<sup>1</sup> In most cases, given the realities of shipboard life, these crimes will be “organized crime,” understood as crimes committed by a structured group of three or more persons.<sup>2</sup>

There is ample evidence of organized fishing crimes committed in the nine countries covered by this report. Before turning to the features of specific countries, however, it is worth recognizing that at least three broad but distinct sets of dynamics are typically present across the hemisphere, each involving distinct actors and regulatory issues.

- 1) The first set of dynamics relates to littoral, artisanal fishers, often from marginalized populations, operating in coastal waters. Their behavior may vary significantly depending on the regulatory environment, but by virtue of their small scale, their catch often falls in the unreported or unregulated category. By virtue of their marginal economic situation, fishers in this population may individually engage in practices, such as seaweed harvesting, pursuit of endangered species, or off-season fishing, that are small-scale but can be quite damaging in the aggregate. By virtue of their maritime skills and equipment, these populations may also be witting or unwitting accomplices to a variety of coastal crimes, such as smuggling of contraband, fuel, or narcotics.
- 2) The second set of dynamics relates to domestic industrial fishers operating within national EEZ boundaries. In some cases, particularly in South America, these domestic industrial fishing fleets may not be all that different from foreign fleets in the same waters, engaging in sophisticated fishing practices using modern equipment. They will compete for resources between the coastline and the outer limits of the EEZ. The major difference is that they are likely to come under national regulation, especially as they offload catch in home ports. IUU fishing in this segment is likely to include more “sophisticated” crimes than in the first segment, such as misreporting of catch, food and document fraud.
- 3) The third set of dynamics relates to international distant water fleets operating offshore, often at the border of national EEZs. These fleets are in practice largely unpoliced, with loose supervision by either their flag state or their port state while they are offshore. They may use flags of convenience that lessen the regulatory burden they face. They may benefit from significant government subsidies<sup>3</sup> and may engage in practices such as transshipment to reefer ships that permit them to remain at sea for years on end. Fishing-related crimes in this segment may include misreporting catch, upgrading (dumping less valuable stored catch in favor of newer, more valuable catch), failure to abide by local laws, fishing in protected areas, fishing within the EEZ, exceeding quotas, etc. Distant

water fishing fleets introduce a host of issues, such as flags of convenience, ownership transparency, and other aspects of international law, that greatly complicate any single national government’s ability to police IUU fishing.

With these dynamics in mind, let us turn to each of the countries in turn.

### *Jamaica*

Jamaica suffers from the effects of a largely unregulated domestic artisanal fishing fleet, as well as incursions by fishing vessels from nearby countries such as the Dominican Republic and Honduras.<sup>4</sup> IUU fishing is conducted by domestic artisanal fishers operating without permits,<sup>5</sup> as well as “large scale illegal harvesting of high-value species” by foreign vessels, including species such as queen conch, spiny lobster, and, increasingly, sea cucumbers.<sup>6</sup>

As in other countries of the Caribbean, one of the most significant challenges in Jamaica is the combination of poor regulation and very sparse data collection. At present, conch and lobsters are the only two regulated species, but even with these species, monitoring, control and surveillance capacity is insufficient to serve as a significant deterrent.<sup>7</sup> As an archipelagic nation, Jamaica has a marine space 24 times larger than its landmass, which makes it difficult to monitor (Table 1).

Crimes associated with IUU fishing in Jamaica may include cash sales of fish in ports that contribute to evasion and laundering.<sup>8</sup> Human trafficking for forced labor has been observed on board some foreign vessels operating in Jamaican waters.<sup>9</sup> In one 2012 case, twenty minors were found working on a Honduran vessel illegally fishing, and in another case in 2018, undocumented Nicaraguans were found working on a ship, both in Jamaican waters.<sup>10</sup> Other crimes, not directly related to fishing, have also been reported. Jamaica’s geographic position, large maritime domain, and craggy coastline have made it a transit point for drugs and weapons on their way to and from South America and North America and Europe.<sup>11</sup> For example, fishing canoes have been found transporting marijuana to Haiti from Jamaica, where it is traded for illegal weapons.<sup>12</sup> Skilled Jamaican crews are in demand for smuggling of guns, cocaine, marijuana, and other contraband throughout the Caribbean.<sup>13</sup>

**Table 1: Ratio of EEZ to Land Mass**

	<b>EEZ Area (in square km)</b>	<b>Land mass (in square km)</b>	<b>EEZ/Land Mass Ratio</b>
Jamaica	263,284	10,830	24.3
Costa Rica	572,131	51,060	11.2
Chile	3,648,534	743,532	4.9
Panama	330,783	74,177	4.5
Ecuador	1,072,097	248,360	4.3
Suriname	127,817	156,000	0.8
Uruguay	133,014	175,020	0.8
Guyana	140,369	196,850	0.7
Argentina	1,082,467	2,736,690	0.4

Sea Around Us database (<https://www.seaaroundus.org/data/#/eez>) for EEZ data; World Bank (<https://data.worldbank.org/indicator/AG.LND.TOTL.K2>) for land mass data.

### *Guyana*

IUU fishing in Guyana hews most closely to the first set of dynamics described in the introduction, related to artisanal fishers, but in part this may be because there is little national data available on fishing further offshore. Recent satellite data shows moderate fishing along the boundary of the EEZs of Guyana, Suriname, French Guiana and Brazil, and foreign vessels are present both within Guyanese waters and outside its EEZ, including vessels from Venezuela, Suriname, China, the United States and the Dominican Republic.<sup>14</sup> But it is impossible to ascertain from this data alone whether the fishing at the border of the EEZ is illegal, unregulated, or unreported.

Within its domestic waters, Guyana is believed to suffer from significant IUU fishing, impacting populations of finfish, red snapper, prawns, seabob, whitebelly and tuna.<sup>15</sup> However, Guyana does not have the resources to fully patrol its waters, and licensing of domestic fishers is non-systematic. A lack of data and poor data collection methods means that there are few reliable national estimates of the number of vessels engaged in fishing, legally or otherwise.<sup>16</sup> To a considerable extent, Guyana relies on private vessels to spot suspected illegal fishing and floating fish factories further offshore.

Among the crimes noted by sources in Guyana are poaching and piracy.<sup>17</sup> In 2018 Suriname convicted nine Guyanese men for the murder of twelve rival fishers in Suriname's waters, in an apparent dispute over fishing locales, sentencing them to imprisonment varying from five to 35 years.<sup>18</sup> Guyana also has issues with drug trafficking, especially to Europe and North America. Guyanese fishing vessels have been found to engage in "mothership" operations to offload drugs offshore,<sup>19</sup> and the country is an important transit point for Colombian cocaine, which often finds its way to seaborne routes.<sup>20</sup> For example, in 2017 four Guyanese fishers were arrested for smuggling 4.2 tons of cocaine on a fishing boat heading north of Suriname.<sup>21</sup>

### *Suriname*

Suriname suffers from a similar dynamic as Guyana, albeit with a more regulated domestic fleet and a fairly strong consensus between fishers and authorities on the importance of preserving access to foreign markets – particularly in the EU – through effective regulation. It also has foreign industrial fishing vessels offshore, both from its regional neighbors and from Asia and Europe. As one workshop participant noted, by dint of the large number of colonial links between Europe and the Caribbean, as with French Guiana, Caribbean fishing grounds serves as a way for European governments to ease the pressure on their own fishing industry.

Over the years Japan has established two fisheries centers and provided substantial financial and material donations to Suriname. In return Suriname has supported Japan's commercial whaling interests in such forums as the International Whaling Commission (IWC) which it joined in 2004 (although Japan left the IWC in 2019). Suriname also has a bilateral agreement with Venezuela whereby Venezuelan boats are permitted via a fish processing company in Suriname.<sup>22</sup>

Although licensing is more controlled in Suriname than the other two Caribbean nations covered in this report, sources point to a number of pervasive problems, such as the renting out of fishing licenses to foreign actors and the landing of Surinamese catch in Guyana.<sup>23</sup> The majority of fishers in Suriname have fishing licenses and registered boat numbers, but sources note that these licenses are often copied and recopied. Falsely registered vessels are then used to fish in Suriname, French Guiana and Brazil.<sup>24</sup> In recognition of this problem, the government has paused licensing: existing permits are being renewed, however, no new licenses are being granted.<sup>25</sup>

Suriname is a prime spot for IUU fishing not only for fishers from Suriname but also for fishers coming from Trinidad, French Guiana, Guyana and Venezuela. The abundance of mangroves and mud banks means that there are large quantities of fish which in turn attracts high numbers of IUU fishers.<sup>26</sup> IUU fishing is associated with various other crimes in Suriname. As noted in the section on Guyana, a mass homicide was committed in 2018, when twelve fishers were killed in a dispute over fishing territory. Smuggling is an issue, in particular to Brazil. Fish bladder is a particularly popular item to smuggle due to its high price in Asian markets.<sup>27</sup> Scattered reports exist of human smuggling in the fisheries industry.<sup>28</sup> There are also multiple reports of cocaine trafficking in Suriname's waters.<sup>29</sup> There is also a recurring problem of theft of fishers' nets, which are extremely expensive.<sup>30</sup>

### ***Costa Rica***

Costa Rica suffers particularly from criminal activities committed by artisanal fishers and by foreign fleets. In part due to political pressures, there is very little regulation of domestic fishing licenses, leading to a proliferation of artisanal fishing vessels. Lax regulation carries over to more sophisticated industrial fishers, including both domestic and foreign actors. It has been estimated that around 17% of landings on Costa Rica's Pacific coast, including industrial, subsistence and sport fishing, go unreported.<sup>31</sup> Most tuna fishing within Costa Rica's EEZ is carried out by foreign ships.<sup>32</sup> Although in theory, port controls may be a method of reducing IUU fishing by foreign vessels, transshipments at sea allow boats to avoid the country's ports altogether, making the job of tracing illegally fished animals difficult.<sup>33</sup> NOAA reported Costa Rica to Congress in 2021, listing a number of problematic practices, including poor reporting to ICCAT, harvest of North Atlantic swordfish without quota, and extensive overharvest of Atlantic white marlin.<sup>34</sup>

A number of factors make Costa Rica extremely attractive to fishers. It is home to the Thermal Dome, an area of colder, nutrient rich water that fluctuates from 300 to 1,000km in diameter.<sup>35</sup> It also contains a number of marine protected areas (MPAs) rich in marine life. Further, although the location of Costa Rica's EEZ means that it is not as vulnerable to encroachment from international fleets as other countries in the region – ships would in many cases have to pass through the EEZs of Colombia, Ecuador, or Panama in order to reach Costa Rican fishing grounds<sup>36</sup> -- the EEZ is only nominally policed.

This is in part because Costa Rica has an Exclusive Economic Zone (EEZ) eleven times the size of its land area. Low MCS capacity, and the government's prioritization of other crimes such as

drug trafficking,<sup>37</sup> spell considerable impunity for fishing crimes. Illegal practices, such as large net fishing in the Pacific Gulf of Nicoya and in the waters of the Cocos Island National Park, are frequent<sup>38</sup> and largely unprosecuted. Of the 220 sightings of vessels within the marine protected area of Cocos Island Park between 2005 and 2018, only six led to legal sanction.<sup>39</sup> Closed seasons designed to protect the reproduction of species, such as in the Gulf of Nicoya, are not complied with, particularly by artisanal fishers.<sup>40</sup> The government has been accused of tolerating, to a certain extent, unlicensed fishing by artisanal fishers.<sup>41</sup> One study showed that 90% of vessels caught within the Cocos Island's protected marine space were Costa Rican and concluded that national fishers, rather than international fleets, posed the greatest threat to species in this zone.<sup>42</sup> That said, foreign ships have also been observed in the country's EEZ.<sup>43</sup> Illegal fishing of various species of tuna – yellowfin, skipjack, bigeye and black skipjack – has been significant.<sup>44</sup> Although regulations are in place to protect sailfish – a major draw for tourists – it is fished at increasing rates.<sup>45</sup> There is a significant domestic black market for turtle eggs and fish, as well as supply of foreign markets for shark fin.<sup>46</sup>

Costa Rica's location between South America and North America means that illegal fishing often has links to crimes such as drug trafficking, as well as people trafficking or smuggling.<sup>47</sup> One maritime enforcement specialist drew a connection between illegal fishing and drug trafficking, particularly in coastal areas, stating that illegal fishers rob legal fishers of a potential money making opportunity, and thus cause them to resort to illegal methods of attaining income, including drug trafficking.<sup>48</sup> Fishing boats are used for drug trafficking,<sup>49</sup> with Costa Rican ships in some cases used to unload drugs to other ships on the high seas.<sup>50</sup> There is anecdotal evidence of fisheries being used to launder drug money.<sup>51</sup> Human trafficking has been reported in prior years, including labor exploitation on fishing vessels.<sup>52</sup>

### ***Panama***

The regulation of local fishing vessels in Panama is significantly stronger than in neighboring Costa Rica. However, Panama's role as a flag of convenience makes it not only a victim of IUU fishing by distant water fleets, but also an important enabler of some of the worst IUU fishing dynamics, both in its own territory and beyond it.

Within Panamanian waters, foreign ships are believed to be the most important actors in IUU fishing. The species most affected by IUU fishing are shrimp, Caribbean and Pacific lobster, sea cucumbers, sea conch, and dorado.<sup>53</sup> Tuna and shark are also targeted and overfished.<sup>54</sup> Chinese vessels, in particular, are the most frequent foreign presence in the Sea of Panama and the Panamanian EEZ.<sup>55</sup> At the 200-mile mark, Chinese vessels reportedly engage in a variety of illegal practices, including overfishing and unreported transfers to processing vessels,<sup>56</sup> while frequently turning off their transponders to undermine MCS.<sup>57</sup> They catch large volumes of sharks “incidentally,” finning them for sale to Asian markets.<sup>58</sup> They are also present and suspected of fishing in protected areas.<sup>59</sup>

IUU fishing by vessels flying the Panamanian flag has been significant in foreign EEZ and RFMO waters, a crime made more jarring by the ease with which vessels have been able to switch flags and thereby avoid fines.<sup>60</sup> So-called flags of convenience permit shipowners to take

advantage of looser regulations, preserve ownership anonymity, and make it very difficult to punish IUU fishing activities.<sup>61</sup> Panama provides a flag for 16% of global carrying capacity, and as of 2020, nearly 400 fishing vessels,<sup>62</sup> and flagging provides some \$500 million in annual revenue for the Panamanian government.<sup>63</sup> Panamanian-flagged vessels are attractive because the flags of convenience are lightly regulated, but have the implicit political protection of the United States.<sup>64</sup>

Beyond IUU fishing itself, the isthmus location of Panama has made it susceptible to drug trafficking, and there are credible reports of drug trafficking by fishing vessels in Panamanian waters.<sup>65</sup>

### ***Ecuador***

Ecuador suffers from all three dynamics outlined above, as both victim and perpetrator of IUU fishing. Reports of IUU fishing near the Galapagos Islands by foreign vessels are widespread. But there is also significant IUU fishing by Ecuadoran vessels in those same waters, as well as in protected areas in Colombia and Costa Rica.<sup>66</sup> In 2019 NOAA cited Ecuador for violations of international agreements<sup>67</sup>, and in 2018 a committee within the CITES convention recommended suspension of trade in fish with Ecuador due to contraventions.<sup>68</sup>

Ecuadorian law authorizes two types of fishing; artisanal and industrial. Only artisanal fishers are authorized to fish within the Galapagos Island reserve and must do so in accordance with the guidelines set out by the Ministry of the Environment which monitors the fishing zone and size of the catch. Beyond this there are 160 nautical miles of insular exclusive economic zone where much IUU fishing takes place, especially since 1998 when the marine reserve was created and fishers were pushed further out into the economic zone. Longline fishers and the national tuna industry fish from 41 miles out. Despite not being able to fish within the marine reserve, fishers use aggregator devices to capture species within the reserve and pull them out.<sup>69</sup>

Shark fishing is popular and 2021 saw the highest number of fin exports in the last five years. It is estimated that around 200,000 sharks are “incidentally” fished each year. In one notorious incident, the Chinese vessel *Fu Yuan Yu Leng* was caught crossing through the Marine Reserve in 2017 without permission, with more than seven thousand sharks on board.<sup>70</sup> Despite regulations aimed at diminishing finning<sup>71</sup>, the practice continues: in May 2020, Hong Kong impounded 24 tons of illegal shark fins from Ecuador, the largest seizure in Hong Kong history.<sup>72</sup>

IUU fishing is driven by a combination of domestic industrial fishers and Asian fishing fleets.<sup>73</sup> In one of the most notorious examples, in July 2020 the Ecuadorian Navy raised concerns about a fleet of more than 340 vessels located just outside of the Exclusive Economic Zone, the majority of which were flagged as Chinese.<sup>74</sup> These vessels had turned off their tracking and identification systems.<sup>75</sup> More recently, Global Fishing Watch VMS data continues to show signs of possible transshipment – “where two vessels, a carrier and fishing vessel, were within 500 meters for at least 2 hours and traveling at a median speed under 2 knots...” – in waters off the Galapagos.<sup>76</sup>

Crimes associated with IUU fishing run the gamut. Ecuador is considered a top tier risk jurisdiction for human trafficking, including forced labor, in the fisheries industry.<sup>77</sup> Drug trafficking is another concern: Ecuador is a major transit country both for chemical precursors, as well as for cocaine and heroin from Colombia and Peru, and they provide an easy way for fishers to make extra money: in towns such as Pasorja, fishers can earn anywhere between \$10,000 and \$30,000 for a single smuggling trip.<sup>78</sup>

### *Chile*

Although Chile has one of the best regulated fisheries sector of the nine countries covered by this report, it nonetheless suffers substantially from the first and second dynamics of IUU fishing noted at the outset, which jointly may cost the country between \$300 and \$400 million a year, and account for about 30% of all catch.<sup>79</sup> The third dynamic, of IUU fishing by foreign distant water fleets, has been observed, but is not as prevalent, in part because of the deterrence efforts of Chilean naval authorities.

The dynamics of artisanal fishers are important for IUU fishing in Chile.<sup>80</sup> At the most basic level, relatively unsophisticated fishers with simple equipment can make a reasonable living by harvesting seaweed for export, an unregulated and largely unreported but extraordinarily damaging practice.<sup>81</sup>

For both artisanal and domestic industrial fishing vessels, middlemen and fish traders play a key role in IUU fishing dynamics, by engaging in both document fraud and trade in illicit seafood.<sup>82</sup> Several sources confirm that these intermediaries profit from IUU fishing.<sup>83</sup> They pay a small overhead on production above the quota limit<sup>84</sup> and thus fraudulently “launder” the fish that are sold on the domestic market.<sup>85</sup> They have the storage and transportation equipment that make such crimes possible, and oftentimes have licit ties to fishers as buyers and suppliers.<sup>86</sup> Artisanal fishers may resort to IUU fishing as a response to the quotas imposed by authorities, incentivized by middlemen.<sup>87</sup> When fishers face low prices, they prefer to sell their license to larger ships that pull together a catch piecemeal, employing a variety of quota licenses.<sup>88</sup> Middlemen may provide invoices to intermediaries, which can be used to slip illegal catch past legal authorities.<sup>89</sup>

With regard to the second set of dynamics, by domestic industrial boats, a variety of IUU fishing crimes have been observed. The first is offshore, undeclared transfer of catch on the high seas.<sup>90</sup> This happens primarily above industrial vessels that have exceeded their quota, who then contact other ships – including foreign vessels – so as not to lose their surplus profit.<sup>91</sup> Another practice is theft from protected or special management areas (e.g., monopoly concessions provided to artisanal fishers from particular communities, intended to encourage sustainable harvesting of the resources in their concession areas<sup>92</sup>). Since the location of these management areas is public knowledge, they can easily be targeted by either artisanal or industrial vessels who enter the management areas with their tracking systems turned off and may subsequently engage in seafood laundering, mixing illicit haul with licit catch.<sup>93</sup>

Crimes associated with IUU fishing are less evident in Chile than in some other neighboring countries. Although there are suggestions of links between artisanal fishers and drug trafficking, there is little direct evidence to confirm the involvement of Chilean fishing vessels, although

Colombian and Peruvian vessels have been seized by Chilean authorities in recent years.<sup>94</sup> Similarly, there are suggestions that seafood laundering might be a good avenue for laundering drug proceeds, but little direct evidence.<sup>95</sup> Proof of other crimes is more robust, such as fraud and corruption. Document fraud in offloading ports is suspected, and perhaps made possible through the payment of bribes, although we do not have direct evidence of bribery of fishery regulators.<sup>96</sup>

### *Argentina*

Like Chile, Argentina has considerable offshore maritime domain awareness, although the persistent presence of significant foreign distant water fleets at the edge of its EEZ tests naval capacity. The most important IUU fishing dynamic for Argentina is the presence of foreign, particularly Chinese, ships operating just outside its EEZ. The most trafficked species in the area, by a substantial margin, is squid, followed by the Patagonian toothfish. Many other types of fish, such as hake, suffer from being caught incidentally. Overall, more than 750,000 tons of fishery resources may be extracted illegally from Argentina's EEZ annually by foreign fleets.<sup>97</sup>

A study of the period between January 2018 and late April 2021 found more than 800 fishing vessels within 20 nautical miles of Argentina's EEZ border, with most of their apparent fishing hours conducted "in the dark", with their AIS trackers turned off. Nearly two-thirds of the "dark" vessels were Chinese.<sup>98</sup> A variety of IUU fishing practices are associated with this offshore fishing just outside Argentina's territorial limits. Foreign ships outside the EEZ are not subject to the same standards required of Argentinian fishing boats within it, such as those governing waste disposal in the ocean or explicitly forbidding the transfer of fuel at sea. Argentine fishers have complained that they face aggressive behavior from foreign ships when they try to leave the EEZ. Several notorious vessels have resisted authorities when found within this zone. Foreign vessels have been accused of turning off transponders to avoid notice when straying into Argentina's EEZ, and there is frequent evidence of transshipment in this area.<sup>99</sup>

At least three factors contribute to the problem of IUU fishing at the edge of Argentina's EEZ: distant water fleet subsidies, lack of an RFMO, and the relative proximity of the port of Montevideo. Many foreign ships are able to operate in Argentine waters, far from their home ports, due to subsidies from their respective nations. In the case of Taiwan, South Korea, and Spain, these usually come in the form of fuel provisions, while some Chinese boats also receive tax exemptions and navigation equipment (see endnote 3). Another problem that contributes to the particular Argentine IUU fishing dynamic is the lack of fishing regulations in the sea outside of Argentina's EEZ, due to the absence of a Regional Fisheries Management Organization (RFMO), the lack of which is partly a result of conflicting claims in the South Atlantic by Argentina and the United Kingdom. The British government's licensing of foreign ships that operate in waters off the Falkland islands ("illegally" in the eyes of the Argentines), has also been posited as a significant factor in terms of overfishing. Part of the problem is a lack of transparency in the number of ships the UK licenses. A third concern is that, by accepting ships from the foreign fleet at Montevideo port without applying necessary controls, Uruguay is contributing to IUU fishing by allowing foreign fishing fleets to stay away from their home ports indefinitely.



A number of crimes are associated with IUU fishing in Argentine waters. The most significant concern is the treatment of crewmembers aboard foreign vessels near Argentina's EEZ, especially those flying the Chinese flag. Although captains and officers on these ships are Chinese, there are credible reports of the abuse and traffic of crew members, who are typically from Indonesia, the Philippines and countries across Africa. Knowledgeable observers suggest the lack of control of IUU fishing potentially opens the door for other illegal activities, such as drug trafficking or money laundering. In 2019 a group of Chinese nationals were accused of smuggling, money laundering and evading some \$23 million in taxes, using fish export businesses based in the coastal city of Mar del Plata.<sup>100</sup>

### *Uruguay*

This report has already alluded to the important enabling role of Uruguay in IUU fishing in the south Atlantic. As with several of the other countries in this report, such as Panama and Ecuador, Uruguay is both an enabler and a victim of IUU fishing.

With regard to the first and second dynamics described in the introduction, two points are worth making. First, the fishing industry in Uruguay has declined significantly in recent decades. Second, the government has not shown much political commitment to regulate fishing, whether artisanal, industrial, or foreign deep water,<sup>101</sup> despite having a number of coastal fisheries. More than 400 IUU fishing vessels are believed to operate off the Uruguayan coast, including both Uruguayan vessels and ships from Brazil.<sup>102</sup> Uruguay has seen IUU fishing of protected species, of spawning and juvenile fish, and the use of prohibited practices, such as bottom trawling, that have significant impacts on marine ecosystems.<sup>103</sup>

With regard to the third dynamic, the port of Montevideo plays a very significant role in enabling IUU fishing by distant water fleets in the South Atlantic. Foreign fleets from China, Portugal and Spain are attracted to Uruguay, due to its proximity to good fisheries and low regulatory oversight of the fishing industry.<sup>104</sup> Uruguay's enforcement is particularly weak by comparison to that of its neighbors.<sup>105</sup> A 2017 study found that the port was the second most visited port in the world for transshipment vessels ("reefers") suspected of IUU fishing.<sup>106</sup> Although that study is now somewhat dated, there are few indications that the port's role has changed significantly.<sup>107</sup> Many foreign vessels suspected of fishing "dark" off the Argentine EEZ subsequently proceed into the port.<sup>108</sup> The port is open to foreign vessels needing resupply and repair, and also permits offloading of illegal catch.<sup>109</sup>

Sources interviewed by our team suggest that there is active bribery in the port. Although there is ample evidence of offloading of illegal seafood, port authorities have actively regulated or prosecuted such behavior.<sup>110</sup> China is an important trading partner of Uruguay's, and Chinese vessels are the most common in the Montevideo port.<sup>111</sup> Chinese demand is clearly central to the Uruguayan fishing economy.<sup>112</sup>

The port of Montevideo sees a number of crimes associated with IUU fishing. Human trafficking and labor abuses in the port of Montevideo are the most important. Local union officials report that complaints are regularly made to port authorities and maritime agencies, but little has been done to address these issues.<sup>113</sup> Among the complaints is the subcontracting of crew not from the

vessel's flagged ship state. Subcontractors often recruit crew from other countries such as Peru, and place them on distant water vessels that are known for bad labor practices.<sup>114</sup> Another complaint regards crew who are abandoned in port, often with signs of mistreatment and physical abuse, without documents or money.<sup>115</sup> Others have been confined to ship while in port, without shore leave, and often intimidated and threatened when they seek to leave their vessel.<sup>116</sup> Mistreatment has been so significant that there have been repeated, confirmed reports of crew members' bodies being offloaded in port.<sup>117</sup> Drug trafficking through the port of Montevideo is also well-established. Although the seizure did not involve fishing vessels per se, in 2018 a cargo of 400 kilos of cocaine was seized from a shipping container, in a scheme that involved both customs officials and a prominent fishing business owner.<sup>118</sup>

## Notes

- <sup>1</sup> INTERPOL. 2018. “International Law Enforcement Cooperation in the Fisheries Sector: A Guide for Law Enforcement Practitioners.” INTERPOL; Moloney, K. and Neil, J. 2020. “IUU Fishing, Transnational Crime and Jamaica’s Incomplete Policy Design.” *Caribbean Journal of Criminology* 2, no. 1. p.6. Available at: [https://www.researchgate.net/publication/345316817\\_IUU\\_Fishing\\_Transnational\\_Crime\\_and\\_Jamaica's\\_Incomplete\\_Policy\\_Design](https://www.researchgate.net/publication/345316817_IUU_Fishing_Transnational_Crime_and_Jamaica's_Incomplete_Policy_Design)
- <sup>2</sup> The Copenhagen Declaration recognizes that “this transnational activity includes crimes committed through the whole fisheries supply and value chain which includes illegal fishing, corruption, tax and customs fraud, money laundering, embezzlement, document fraud and human trafficking.”
- <sup>3</sup> A 2019 study of harmful fishing subsidies found that governments provided subsidies per ton of fish caught of \$946 (China), \$749 (S.Korea), \$228 (U.S.), \$147 (Russia), \$130 (Japan), \$80 (EU), and \$59 (Taiwan). Arthur, Robert, Stephanie Heyworth, John Pearce, and William Sharkey. Working paper. *The Cost of Harmful Fishing Subsidies*. London, UK: IIED, 2019.
- <sup>4</sup> InSight Crime interview with Shawn Taylor, Chair at JFCU, 15 February 2022.
- <sup>5</sup> Blue Justice. 2020. “Discussion Document on Smuggling of Goods and Human Smuggling in the Caribbean: The Role of the Fisheries Sector.” Blue Justice. Available at: <https://bluejustice.org/wp-content/uploads/2020/11/Smuggling-of-Goods-Caribbean.pdf>
- <sup>6</sup> Witbooi, E. 2020. “Criminality and Resilience: Rocky Point, Jamaica”. Global Initiative Against Transnational Organized Crime. p.18. Available at: <https://globalinitiative.net/wp-content/uploads/2020/02/Jamaica-report.26.02.v1.pdf>
- <sup>7</sup> InSight Crime interview, Caribbean Coastal Area Management Foundation Jamaica, 3 December 2021.
- <sup>8</sup> Neil, J. 2018. “IUU fishing: a gateway to transnational crimes in Jamaica”. p. 39. Available at: [https://commons.wmu.se/cgi/viewcontent.cgi?article=1656&context=all\\_dissertations](https://commons.wmu.se/cgi/viewcontent.cgi?article=1656&context=all_dissertations)
- <sup>9</sup> Witbooi, E. 2020. “Criminality and Resilience: Rocky Point, Jamaica”. Global Initiative Against Transnational Organized Crime. p.18. Available at: <https://globalinitiative.net/wp-content/uploads/2020/02/Jamaica-report.26.02.v1.pdf>
- <sup>10</sup> Neil, J. 2018. “IUU fishing: a gateway to transnational crimes in Jamaica.” p. 39. Available at: [https://commons.wmu.se/cgi/viewcontent.cgi?article=1656&context=all\\_dissertations](https://commons.wmu.se/cgi/viewcontent.cgi?article=1656&context=all_dissertations). p. 53-56.
- <sup>11</sup> Witbooi, E. 2020. “Criminality and Resilience: Rocky Point, Jamaica”. Global Initiative Against Transnational Organized Crime. p.5. Available at: <https://globalinitiative.net/wp-content/uploads/2020/02/Jamaica-report.26.02.v1.pdf>
- <sup>12</sup> Witbooi, E., Ali, KD., Santosa, M.A. 2020. “Organized crime in the fisheries sector threatens a sustainable ocean economy.” *Nature* 588, p. 48-56. Available at: <https://www.nature.com/articles/s41586-020-2913-5?proof=t%25C2%25A0#citeas>
- <sup>13</sup> Moloney, K. and Neil, J. 2020. “IUU Fishing, Transnational Crime and Jamaica’s Incomplete Policy Design.” *Caribbean Journal of Criminology* 2, no. 1. Available at: [https://www.researchgate.net/publication/345316817\\_IUU\\_Fishing\\_Transnational\\_Crime\\_and\\_Jamaica's\\_Incomplete\\_Policy\\_Design](https://www.researchgate.net/publication/345316817_IUU_Fishing_Transnational_Crime_and_Jamaica's_Incomplete_Policy_Design); Witbooi, E. 2020. “Criminality and Resilience: Rocky Point, Jamaica”. Global Initiative Against Transnational Organized Crime. p.10. Available at: <https://globalinitiative.net/wp-content/uploads/2020/02/Jamaica-report.26.02.v1.pdf>; Blue Justice. 2020. “Discussion Document on Smuggling of Goods and Human Smuggling in the Caribbean: The Role of the Fisheries Sector.” Blue Justice. Available at: <https://bluejustice.org/wp-content/uploads/2020/11/Smuggling-of-Goods-Caribbean.pdf>; Neil, J. 2018. “IUU fishing: a gateway to transnational crimes in Jamaica”. p. 39. Available at: [https://commons.wmu.se/cgi/viewcontent.cgi?article=1656&context=all\\_dissertations](https://commons.wmu.se/cgi/viewcontent.cgi?article=1656&context=all_dissertations)
- <sup>14</sup> <https://globalfishingwatch.org/map/>, accessed June 2, 2022.
- <sup>15</sup> Seoraj, N. 2021. “Fishing industry ‘nets’ \$16.2B.” *Guyana Chronicle*. Available at: <https://guyanachronicle.com/2021/01/08/fishing-industry-nets-16-2b/#:~:text=Last%20year%2C%20Guyana%20produced%20finfish,earned%20stakeholders%20over%20%241%20billion>
- <sup>16</sup> InSight Crime interview with Adrian LaRoda, Chairman of the Caribbean Network of Fisherfolk Originations, 18 January 2021.
- <sup>17</sup> InSight Crime interview with Adrian LaRoda, Chairman of the Caribbean Network of Fisherfolk Originations, 18 January 2021.

- <sup>18</sup> <https://www.stabroeknews.com/2020/02/21/news/guyana/piracy-attack-that-killed-12-guyanese-linked-to-turf-war-inquiry/#:~:text=It%20was%20reported%20in%20the,to%2035%20years%20imprisonment%20each>. InSight Crime Interview, Udo Karg, President Suriname Seafood Association, Suriname, February 4, 2022.
- <sup>19</sup> Moloney, K. and Neil, J. 2020. "IUU Fishing, Transnational Crime and Jamaica's Incomplete Policy Design." *Caribbean Journal of Criminology* 2, no. 1. p.7. Available at: [https://www.researchgate.net/publication/345316817\\_IUU\\_Fishing\\_Transnational\\_Crime\\_and\\_Jamaica's\\_Incomplete\\_Policy\\_Design](https://www.researchgate.net/publication/345316817_IUU_Fishing_Transnational_Crime_and_Jamaica's_Incomplete_Policy_Design)
- <sup>20</sup> Smith, G. and Burkhardt, D. 2017. "Socio-economic Study of the Fisheries Sector in Suriname." WWF Guianas. p. 1-46; Bureau for International Narcotics and Law Enforcement Affairs. 2020. "International Narcotics Control Strategy Report: Volume I, Drug and Chemical Control." U.S. Department of State. Available at: <https://www.state.gov/wp-content/uploads/2020/06/Tab-1-INCSR-Vol.-I-Final-for-Printing-1-29-20-508-4.pdf>
- <sup>21</sup> *Guyana Chronicle*. 2017. "4.2 tons cocaine seizure: four Guyanese to face charges in US Virgin Islands." *Guyana Chronicle*. Available at: <https://guyanachronicle.com/2017/02/28/4-2-tons-cocaine-seizure-four-guyanese-to-face-charges-in-us-virgin-islands/>
- <sup>22</sup> InSight Crime Interview, Michael Hiwatt, Oceans and Wildlife Officer at WWF Guianas, Suriname, February 4, 2022.
- <sup>23</sup> Smith, G. and Burkhardt, D. 2017. "Socio-economic Study of the Fisheries Sector in Suriname." WWF Guianas. p. 1-46; del Prado, Nancy. 2017. *Marine Management in Suriname: CBD Gap Analysis and Legislative Review Report*. WWF. Gland, Switzerland. Available at: [https://wwflac.awsassets.panda.org/downloads/marine\\_management\\_in\\_suriname\\_cbd\\_gap\\_analysis\\_and\\_legislative\\_review\\_report\\_2018.pdf](https://wwflac.awsassets.panda.org/downloads/marine_management_in_suriname_cbd_gap_analysis_and_legislative_review_report_2018.pdf) ; Hankinson, Sophie. 2019. "Using Fishers Knowledge for Sustainable Management in the Artisanal Gillnet Fishery in Suriname, Student Thesis, WWF Guianas. Available at: [shorturl.at/motGL](http://shorturl.at/motGL)
- <sup>24</sup> InSight Crime Interview, Udo Karg, President Suriname Seafood Association, Suriname, February 4, 2022.
- <sup>25</sup> InSight Crime Interview, Michael Hiwatt, Oceans and Wildlife Officer at WWF Guianas, Suriname, February 4, 2022.
- <sup>26</sup> InSight Crime Interview, Udo Karg, President Suriname Seafood Association, Suriname, February 4, 2022.
- <sup>27</sup> InSight Crime Interview, Rajiv Ramasahai, Owner of four artisanal fishing boats, Suriname, February 4, 2022.
- <sup>28</sup> Global Initiative Against Transnational Organized Crime. 2021. "Suriname." *Global Organized Crime Index*. Global Initiative Against Transnational Organized Crime. Available at: [https://ocindex.net/assets/downloads/english/ocindex\\_profile\\_suriname.pdf](https://ocindex.net/assets/downloads/english/ocindex_profile_suriname.pdf)
- <sup>29</sup> Office of Public Affairs. 2017. "Coast Guard Seizes Cocaine Worth an Estimated \$125 Million." U.S. Department of Homeland Security. Available at: <https://www.dhs.gov/blog/2017/03/01/coast-guard-seizes-cocaine-worth-estimated-125-million>; Global Initiative Against Transnational Organized Crime. 2021. "Suriname." *Global Organized Crime Index*. Global Initiative Against Transnational Organized Crime. Available at: [https://ocindex.net/assets/downloads/english/ocindex\\_profile\\_suriname.pdf](https://ocindex.net/assets/downloads/english/ocindex_profile_suriname.pdf)
- <sup>30</sup> InSight Crime Interview, Rajiv Ramasahai, Owner of four artisanal fishing boats, Suriname, February 4, 2022.
- <sup>31</sup> Daniel Pauly & Dirk Zeller. 2015. "Catch Reconstruction: concepts, methods, and data sources." Sea Around Us. University of British Columbia. Available at: <https://www.seaaroundus.org/doc/Methods/CatchReconstructionMethod/Methods-Catch-tab-May-02-2016.pdf>
- <sup>32</sup> InSight Crime interview with Mónica Espinoza Miralles, Regional manager for Latin America of the Global Fishing Watch Transparency Program, 20 January 2022
- <sup>33</sup> InSight Crime interview with Daniel Carrasco, President of the the Costa Rican Institute of Fisheries and Aquaculture (Instituto Costarricense de Pesca y Acuicultura - INCOPESCA), 19 January 2022
- <sup>34</sup> Coit, J. and Spinrad, R. 2021. "Improving International Fisheries Management: 2021 Report to Congress." National Oceanic and Atmospheric Administration. Available at: <https://media.fisheries.noaa.gov/2021-08/2021ReporttoCongressonImprovingInternationalFisheriesManagement.pdf>
- <sup>35</sup> InSight Crime interview with Mónica Espinoza Miralles, Regional manager for Latin America of the Global Fishing Watch Transparency Program, 20 January 2022
- <sup>36</sup> InSight Crime interview with Mónica Espinoza Miralles, Regional manager for Latin America of the Global Fishing Watch Transparency Program, 20 January 2022
- <sup>37</sup> InSight Crime interview with Comisario Martín Arias, Coast Guard Director, 22 February 2022
- <sup>38</sup> Loaiza, L. 2020. "Costa Rica Boosts Plan to Track Vessels, Combat Illegal Fishing." *InSight Crime*. Available at: <https://insightcrime.org/news/brief/costa-rica-boosts-plan-to-track-vessels-combat-illegal-fishing/>
- <sup>39</sup> Geiner Golfín Duarte. 2021. "Patrones de comportamiento de la pesca ilegal del 2005 al 2018 en el Parque Nacional Isla del Coco" (webinar)
- <sup>40</sup> InSightCrime interview with Jorge Jiménez, General manager of MarViva, 19 January 2022

- 
- <sup>41</sup> InsightCrime interview with Jorge Jiménez, General manager of MarViva, 19 January 2022
- <sup>42</sup> Geiner Golfín Duarte. 2021. “Patrones de comportamiento de la pesca ilegal del 2005 al 2018 en el Parque Nacional Isla del Coco.” (webinar)
- <sup>43</sup> InSight Crime interview with Daniel Carrasco, President of the the Costa Rican Institute of Fisheries and Aquaculture (Instituto Costarricense de Pesca y Acuicultura - INCOPESCA), 19 January 2022
- <sup>44</sup> United Nations Conference on Trade and Development. 2019. “Overview of Economic and Trade Aspects of Fisheries and Seafood Sectors in Costa Rica.” United Nations. Available at: [https://unctad.org/system/files/official-document/ditctedinf2019d13\\_en.pdf](https://unctad.org/system/files/official-document/ditctedinf2019d13_en.pdf)
- <sup>45</sup> Insight Crime interview with Damián Martínez-Fernández, Director of Conservation and Public Policy of the Costa Rican Federation of Fisheries, 23 February 2022
- <sup>46</sup> Global Initiative Against Transnational Organized Crime. 2021. “Costa Rica.” *Global Organized Crime Index*. Global Initiative Against Transnational Organized Crime. Available at: [https://ocindex.net/assets/downloads/english/ocindex\\_profile\\_costa\\_rica.pdf](https://ocindex.net/assets/downloads/english/ocindex_profile_costa_rica.pdf). While the Director of Costa Rica’s Coast Guard states that shark finning is “practically no longer an issue”, others argue that the practice continues. Insight Crime interview with Comisario Martín Arias, Coast Guard Director, 22 February 2022; InSight Crime interview with Mónica Espinoza Miralles, Regional manager for Latin America of the Global Fishing Watch Transparency Program, 20 January 2022.
- <sup>47</sup> InSight Crime interview with Daniel Carrasco, President of the the Costa Rican Institute of Fisheries and Aquaculture (Instituto Costarricense de Pesca y Acuicultura - INCOPESCA), 19 January 2022; Insight Crime interview with Marco Quesada, Vice President of Oceans for the Americas, 19 January 2022.
- <sup>48</sup> Insight Crime interview with Oswaldo Rosero, Specialist in maritime enforcement, 24 February 2022
- <sup>49</sup> Insight Crime interview with Comisario Martín Arias, Coast Guard Director, 22 February 2022
- <sup>50</sup> InsightCrime interview with Jorge Jiménez, General manager of MarViva, 19 January 2022; Bureau for International Narcotics and Law Enforcement Affairs. 2020. “International Narcotics Control Strategy Report: Volume I, Drug and Chemical Control.” U.S. Department of State. Available at: <https://www.state.gov/wp-content/uploads/2020/06/Tab-1-INCSR-Vol.-I-Final-for-Printing-1-29-20-508-4.pdf>; Blue Justice. 2020. “Discussion Document on Smuggling of Goods and Human Smuggling in the Caribbean: The Role of the Fisheries Sector.” Blue Justice. Available at: <https://bluejustice.org/wp-content/uploads/2020/11/Smuggling-of-Goods-Caribbean.pdf>; N.a. 2021. “U.S. Coast Guard Increases Cooperation with Costa Rica and Regional Partners on Illegal Fishing.” *The Tico Times*. Available at: <https://ticotimes.net/2021/12/02/u-s-coast-guard-increases-cooperation-with-costa-rica-and-regional-partners-on-illegal-fishing>.
- <sup>51</sup> Insight Crime interview with Marco Quesada, Vice President of Oceans for the Americas, 19 January 2022; InsightCrime interview with Jorge Jiménez, Director General, MarViva Foundation, 19 January 2022.
- <sup>52</sup> Witbooi, E., Ali, KD., Santosa, M.A. 2020. “Organized crime in the fisheries sector threatens a sustainable ocean economy.” *Nature* 588, p. 48-56. Available at: <https://www.nature.com/articles/s41586-020-2913-5?proof=t%25C2%25A0#citeas>
- <sup>53</sup> Ortiz, Yalena. 2021. “Pesca ilegal acecha al país.” *Metro Libre*. Available at: <https://www.metrolibre.com/cultura/193755-pesca-ilegal-acecha-al-pa%C3%ADs.html>
- <sup>54</sup> InSight Crime, phone interview with Alex Hearn, professor at the Universidad San Francisco de Quito and conservation expert, 15 Feb. 2022.
- <sup>55</sup> InSight Crime, phone interview with captain Sebastián Gallardo, chief of operations in Dirección Nacional de Espacios Acuáticos – Ecuador, 15 Feb. 2022; N.a. 2020. “Panamá alerta ante pesqueros chinos.” Pesca Con Ciencia. Available at: <https://www.pescaconciencia.com/2020/08/04/panama-alerta-ante-pesqueros-chinos/>
- <sup>56</sup> InSight Crime, phone interview with Miren Gutiérrez, ex-director Greenpeace Spain, 9 Feb. 2022.
- <sup>57</sup> InSight Crime, phone interview with captain Nelly Forero, official in the Servicio Nacional Aeronaval, 3 Feb. 2022. InSight Crime, phone interview with Eddie Tapiero, expert on maritime industry, 15 Feb. 2022.
- <sup>58</sup> N.a. 2020 “Panamá decomisa más de 26 mil libras de tiburón y camarones de pesca ilegal.” *Metro Libre*. Available at: <https://www.metrolibre.com/nacionales/177891-panamá-decomisa-más-de-26-mil-libras-de-tiburón-y-camarones-de-pesca-ilegal.html>
- <sup>59</sup> N.a. 2020. “Panamá alerta ante pesqueros chinos.” Pesca Con Ciencia. Available at: <https://www.pescaconciencia.com/2020/08/04/panama-alerta-ante-pesqueros-chinos/>
- <sup>60</sup> Pramod, Ganapathiraju. 2019. *Global Evaluation of Fisheries Monitoring Control and Surveillance in 84 Countries: Panama-Country Report* 1. 1st ed. Vol. 1. IUU Risk Intelligence. Available at: <https://iuriskintelligence.com/wp-content/uploads/2019/12/Panama-country-Report-Global-Fisheries-MCS-Report-2019.pdf>

- 
- <sup>61</sup> Benson, Emily. 2021. “Flagging the Issues: Maritime Governance, Forced Labor, and Illegal Fishing.” Center for Strategic and International Studies. Available at: <https://www.csis.org/analysis/flagging-issues-maritime-governance-forced-labor-and-illegal-fishing>
- <sup>62</sup> Benson, Emily. 2021. “Flagging the Issues: Maritime Governance, Forced Labor, and Illegal Fishing.” Center for Strategic and International Studies. Available at: <https://www.csis.org/analysis/flagging-issues-maritime-governance-forced-labor-and-illegal-fishing>; N.a. 2020. “Off the Hook- How flags of convenience let illegal fishing go unpunished.” Environmental Justice Foundation. Available at: <https://ejfoundation.org/resources/downloads/EJF-report-FoC-flags-of-convenience-2020.pdf>
- <sup>63</sup> Benson, Emily. 2021. “Flagging the Issues: Maritime Governance, Forced Labor, and Illegal Fishing.” Center for Strategic and International Studies. Available at: <https://www.csis.org/analysis/flagging-issues-maritime-governance-forced-labor-and-illegal-fishing>
- <sup>64</sup> InSight Crime, phone interview with Alex Hearn, professor at the Universidad San Francisco de Quito and conservation expert, 15 Feb. 2022; InSight Crime, phone interview with José María Lezcano, maritime law expert, 15 Feb. 2022.
- <sup>65</sup> InSight Crime, phone interview with Miren Gutiérrez, ex-director of Greenpeace Spain, 9 Feb. 2022; Bureau for International Narcotics and Law Enforcement Affairs. 2020. “International Narcotics Control Strategy Report: Volume I, Drug and Chemical Control.” U.S. Department of State. Available at: <https://www.state.gov/wp-content/uploads/2020/06/Tab-1-INCSR-Vol.-I-Final-for-Printing-1-29-20-508-4.pdf>; Ministerio de la Presidencia de Panama. 2021. “Tendremos mayor capacidad para la seguridad de nuestro territorio y del Canal de Panamá”: presidente Cortizo Cohen.” Gobierno de Panama. Available at: <https://www.presidencia.gob.pa/Noticias/-Tendremos-mayor-capacidad-para-la-seguridad-de-nuestro-territorio-y-del-Canal-de-Panam%C3%A1-Cortizo-Cohen->; InSight Crime, phone interview with Miren Gutiérrez, ex-director of Greenpeace Spain, 9 Feb. 2022.
- <sup>66</sup> N.a. 2020. “Ecuador, a victim of illegal fishing, is also a culprit.” *The Economist*. Available at: [https://www.economist.com/the-americas/2020/11/21/ecuador-a-victim-of-illegal-fishing-is-also-a-culprit?utm\\_campaign=editorial-social&utm\\_medium=social-organic&utm\\_source=twitter](https://www.economist.com/the-americas/2020/11/21/ecuador-a-victim-of-illegal-fishing-is-also-a-culprit?utm_campaign=editorial-social&utm_medium=social-organic&utm_source=twitter)
- <sup>67</sup> Sanchez, Wilder Alejandro. 2020. “Ecuador’s Constant Struggle Against Illegal Fishing.” *The Maritime Executive*. Available at: <https://www.maritime-executive.com/editorials/ecuador-s-constant-struggle-against-illegal-fishing>
- <sup>68</sup> N.a. 2020. “Ecuador, a victim of illegal fishing, is also a culprit.” *The Economist*. Available at: [https://www.economist.com/the-americas/2020/11/21/ecuador-a-victim-of-illegal-fishing-is-also-a-culprit?utm\\_campaign=editorial-social&utm\\_medium=social-organic&utm\\_source=twitter](https://www.economist.com/the-americas/2020/11/21/ecuador-a-victim-of-illegal-fishing-is-also-a-culprit?utm_campaign=editorial-social&utm_medium=social-organic&utm_source=twitter)
- <sup>69</sup> InSight Crime interview with Alberto Andrade, general coordinator of the Insular Front of the Galapagos Marine Reserve and artisanal fisherman, 16 November 2021.
- <sup>70</sup> Bonaccorso, E., Ordóñez-Garza, N., Pazmiño. 2021. “International fisheries threaten globally endangered sharks in the Eastern Tropical Pacific Ocean: the case of the Fu Yuan Yu Leng 999 reefer vessel seized within the Galápagos Marine Reserve.” *Scientific Reports*, 11. Available at: <https://www.nature.com/articles/s41598-021-94126-3>
- <sup>71</sup> The government of Rafael Correa (2007-2017) implemented an executive decree prohibiting fishing gear and systems designed to catch sharks. The practice of “finning” was prohibited. The only exception to the law was that if a shark is caught accidentally, it could be sold. Castro, Mayuri. 2021. “Sharks: ‘Ravaged by fishing and lack of information.’” SOS Galapagos. Available at: <https://sosgalapagos.org/2021/07/26/sharks-ravaged-by-fishing-and-lack-of-information/>
- <sup>72</sup> N.a. 2020. “Ecuador, a victim of illegal fishing, is also a culprit.” *The Economist*. Available at: [https://www.economist.com/the-americas/2020/11/21/ecuador-a-victim-of-illegal-fishing-is-also-a-culprit?utm\\_campaign=editorial-social&utm\\_medium=social-organic&utm\\_source=twitter](https://www.economist.com/the-americas/2020/11/21/ecuador-a-victim-of-illegal-fishing-is-also-a-culprit?utm_campaign=editorial-social&utm_medium=social-organic&utm_source=twitter)
- <sup>73</sup> InSight Crime interview with Bruno Leone, President of Ecuador’s National Fisheries Chamber, 23 November 2021.
- <sup>74</sup> Ford, Alessandro. 2020. “Illegal Chinese fishing in the Galapagos: a threat to the biodiversity of the Latin American Pacific.” Open Democracy. Available at: <https://www.opendemocracy.net/en/democraciaabierta/pesca-illegal-china-galapagos-biodiversidad-pac%C3%ADfco-latinoamericano-en/>
- <sup>75</sup> N.a. N.d. “Covering Illegal Fishing in the Galápagos.” Earth Journalism Network. Available at: <https://earthjournalism.net/projects/covering-illegal-fishing-in-the-galapagos>. Accessed March 30, 2022.
- <sup>76</sup> <https://globalfishingwatch.org/map/>, accessed June 2, 2022.
- <sup>77</sup> U.S. Department of State; U.S. Department of Commerce. 2020. “Report to Congress-Human Trafficking in the Seafood Supply Chain.” U.S. Department of State; U.S. Department of Commerce (NOAA). Available at: [https://gpa-mprod-mwp.s3.amazonaws.com/uploads/sites/23/2021/05/DOSNOAAReport\\_HumanTrafficking.pdf](https://gpa-mprod-mwp.s3.amazonaws.com/uploads/sites/23/2021/05/DOSNOAAReport_HumanTrafficking.pdf)

- <sup>78</sup> Wright, Saskia. 2021. “Fishing Village Caught in Crosshairs of Ecuador Drug Gangs.” *InSight Crime*. Available at: <https://insightcrime.org/news/fishing-village-caught-crosshairs-ecuador-drug-gangs/>; Bureau for International Narcotics and Law Enforcement Affairs. 2020. “International Narcotics Control Strategy Report: Volume I, Drug and Chemical Control.” U.S. Department of State. Available at: <https://www.state.gov/wp-content/uploads/2020/06/Tab-1-INCSR-Vol.-I-Final-for-Printing-1-29-20-508-4.pdf>
- <sup>79</sup> Toro, Juan. 2020. “Pesca Ilegal, No Declarada y No Reglamentada: Comprendiendo el Problema/Construyendo las Soluciones.” AthenaLab. Working Paper No. 9. Available at: <https://athenalab.org/wp-content/uploads/2020/10/DT9-Pesca-ilegal-NDNR.pdf>; Stanford Center for Ocean Solutions (COS) and the Stanford Law School (SLS). 2020. “The Outlaw Ocean: An Exploration of Policy Solutions to Address Illegal Fishing and Forced Labor in the Seafood Industry.” COS. Available at: [https://oceansolutions.stanford.edu/sites/g/files/sbiybj13371/f/outlawocean\\_fullreport\\_spring2020.pdf](https://oceansolutions.stanford.edu/sites/g/files/sbiybj13371/f/outlawocean_fullreport_spring2020.pdf)
- <sup>80</sup> Donlan, C.J., Wilcox, C., Luque, G., & Gelcich, S. 2020. “Estimating illegal fishing from enforcement officers.” *Scientific Reports*. 10, 12478. Available at: <https://www.nature.com/articles/s41598-020-69311-5#citeas>.
- <sup>81</sup> Participant in off-the-record workshop on IUU Fishing in South America, American University, May 25, 2022; Carrere, Michelle. 2021. “Chile: la cadena de infracciones detrás de la pesca ilegal de algas.” Mongabay. Available at: <https://es.mongabay.com/2021/02/chile-la-cadena-de-infracciones-detras-de-la-pesca-ilegal-de-algas/>
- <sup>82</sup> InSight Crime, phone interview with Liesbeth van der Meer, Senior Vice President of Oceana in Chile, 8 Nov. 2021.
- <sup>83</sup> InSight Crime, phone interview with Valesca Montes, coordinator of the Sustainable Fishing Program at the World Wildlife Fund (WWF), 30 Nov. 2021. InSight Crime, phone interview with Rodrigo Azócar, director general at PreKautoria Lta, 7 Nov. 2021. InSight Crime, phone interview with Rodrigo Oyanedel, expert on IUU fishing at Oxford University, 10 Nov. 2021.
- <sup>84</sup> Subpesca. 2022. “Cuotas de captura.” Gobierno de Chile. Available at: <https://www.subpesca.cl/portal/615/w3-propertyvalue-50874.html>, Accessed: 1 Apr. 2022.
- <sup>85</sup> InSight Crime, phone interview with Rodrigo Oyanedel, expert on IUU fishing at Oxford University, 10 Nov. 2021; InSight Crime, phone interview with Valesca Montes, coordinator of the Sustainable Fishing Program at the World Wildlife Fund (WWF), 30 Nov. 2021.
- <sup>86</sup> InSight Crime, phone interview with Liesbeth van der Meer, Senior Vice President of Oceana in Chile, 8 Nov. 2021.
- <sup>87</sup> InSight Crime, phone interview with Valesca Montes, coordinator of Sustainable Fishing Program at the World Wildlife Fund (WWF), 30 Nov. 2021; InSight Crime, phone interview with Rodrigo Oyanedel, expert in IUU fishing at Oxford University, 10 Nov. 2021.
- <sup>88</sup> InSight Crime, phone interview with Alex Muñoz, director of Pristine Seas Project, National Geographic Society, 30 Nov. 2021.
- <sup>89</sup> InSight Crime, phone interview with Rodrigo Oyanedel, expert on illegal fishing at Oxford University, 10 Nov. 2021; InSight Crime, phone interview with Liesbeth van der Meer, Senior Vice President of Oceana in Chile, 8 Nov. 2021.
- <sup>90</sup> InSight Crime, phone interview with Valesca Montes, coordinator of the Sustainable Fishing Program at the World Wildlife Fund (WWF), 30 Nov. 2021.
- <sup>91</sup> InSight Crime, phone interview with Valesca Montes, coordinator of the Sustainable Fishing Program at the World Wildlife Fund (WWF), 30 Nov. 2021.
- <sup>92</sup> Biblioteca del Congreso Nacional de Chile (BCN). 2010. “Guía legal sobre: Áreas de manejo de pesca artesanal.” Gobierno de Chile. Available at: <https://www.bcn.cl/leyfacil/recurso/areas-de-manejo-de-pesca-artesanal>, Accessed on 1 April 2022.
- <sup>93</sup> InSight Crime, phone interview with Rodrigo Oyanedel, expert on illegal fishing at Oxford University, 10 Nov. 2021.
- <sup>94</sup> InSight Crime, phone interview with Rodrigo Azócar, director general, PreKautoria Lta, 7 Nov. 2021; Organization of American States and Inter-American Drug Abuse Control Commission (CICAD). 2021. “BORRADOR DE INFORME GRUPO DE EXPERTOS SOBRE NARCOTRÁFICO MARÍTIMO.” Available at: [https://www.oas.org/es/sms/cicad/narcotrafico-maritimo/docs/Informe%20Final\\_GdE%20Narcotrafico%20Maritimo\\_2021.pdf](https://www.oas.org/es/sms/cicad/narcotrafico-maritimo/docs/Informe%20Final_GdE%20Narcotrafico%20Maritimo_2021.pdf); Toro, Juan. 2020. “Pesca Ilegal, No Declarada y No Reglamentada: Comprendiendo el Problema/Construyendo las Soluciones.” AthenaLab. Working Paper No. 9. Available at: <https://athenalab.org/wp-content/uploads/2020/10/DT9-Pesca-ilegal-NDNR.pdf>; Shuldiner, Henry. 2022. “By Land and Sea - Chile Dealing with Surge of Creepy Marijuana.” *InSight Crime*. Available at: <https://insightcrime.org/news/land-sea-chile-dealing-surge-creepy-marijuana/>; Saavedra, Guillermo.

2021. “Chilean Navy Makes Largest Cocaine Seizure.” *Diálogo Americas*. Available at: <https://dialogo-americas.com/articles/chilean-navy-makes-largest-cocaine-seizure/#.YkcqXy-B2qR>.

<sup>95</sup> InSight Crime, phone interview with Rodrigo Azócar, director general at PreKautoria Lta, 7 Nov. 2021; Armada de Chile. 2021. “La amenaza de la pesca ilegal para el ecosistema y la biodiversidad marina.” Dirección General del Territorio Marítimo y de Marina Mercante. Available at: <https://www.directemar.cl/directemar/noticias-y-comunicaciones/noticias/2021/la-amenaza-de-la-pesca-ilegal-para-el-ecosistema-y-la-biodiversidad-marina>.

Accessed 4 April 2022; Organization of American States and Inter-American Drug Abuse Control Commission (CICAD). 2021. “BORRADOR DE INFORME GRUPO DE EXPERTOS SOBRE NARCOTRÁFICO MARÍTIMO.” Available at: [https://www.oas.org/es/sms/cicad/narcotrafico-maritimo/docs/Informe%20Final\\_GdE%20Narcotrafico%20Maritimo\\_2021.pdf](https://www.oas.org/es/sms/cicad/narcotrafico-maritimo/docs/Informe%20Final_GdE%20Narcotrafico%20Maritimo_2021.pdf).

<sup>96</sup> InSight Crime, phone interview with Rodrigo Oyanedel, expert in IUU fishing at Oxford University, 10 Nov. 2021

<sup>97</sup> Pelcastre, Julieta. 2022. “Chinese Fishing Fleet Wreaks Havoc in Latin American Oceans.” *Diálogo Americas*. Available at: <https://dialogo-americas.com/articles/chinese-fishing-fleet-wreaks-havoc-in-latin-american-oceans/#.YkcsUS-B2qR>

<sup>98</sup> Oceana. 2021. “Now You See Me, Now You Don’t: Vanishing Vessels Along Argentina’s Waters.” Oceana. Available at: [https://usa.oceana.org/wp-content/uploads/sites/4/2021/06/oceana\\_argentina\\_mini\\_report\\_finalupdated.pdf](https://usa.oceana.org/wp-content/uploads/sites/4/2021/06/oceana_argentina_mini_report_finalupdated.pdf)

<sup>99</sup> <https://globalfishingwatch.org/map/>, accessed June 2, 2022.

<sup>100</sup> Josefina Salomón, “Chinese Mafia Moving Contraband Fish Costs Argentina Millions,” InSight Crime, October 29, 2019.

<sup>101</sup> Oceanosanos. 2021. “La red que arrasa: ¿Qué se hace en Uruguay para combatir la pesca ilegal?” Oceanosanos. Available at: <https://oceanosanos.org/pesca-ilegal-en-uruguay/>

<sup>102</sup> Gaia Foundation. N.d. “Love the Oceans? Stop Illegal, Unreported and Unregulated Fishing.” Gaia Foundation. Available at: <https://www.gaiafoundation.org/love-the-oceans-stop-illegal-unreported-and-unregulated-fishing/>. Accessed 1 April 2022

<sup>103</sup> InSight Crime, phone interview with Alfonso Miranda, president of CIAT and CLAMASUR, 28 Jan. 2022; InSight Crime, interview with Andres Milessi, coordinator of the Organización para la Conservación de Cetáceos (OCC), 28 Jan. 2022.

<sup>104</sup> InSight Crime, phone interview with Gerardo Fernández and Alexis Pintos, Secretary for Artisanal Fishing and Press Secretary for SUNTMA, 28 Jan. 2022.

<sup>105</sup> InSight Crime, phone interview with Sergio Almada, coordinator of EICEMAR, 17 Jan. 2022.

<sup>106</sup> Malarky, L. & Lowell, B. 2017. “No More Hiding at Sea Transshipping Exposed.” Oceana. Available at: [https://usa.oceana.org/wp-content/uploads/sites/4/oceana\\_transshipping\\_exposed\\_report\\_final\\_0.pdf?\\_ga=2.159488573.1633605506.164841048-687649835.1648410048](https://usa.oceana.org/wp-content/uploads/sites/4/oceana_transshipping_exposed_report_final_0.pdf?_ga=2.159488573.1633605506.164841048-687649835.1648410048)

<sup>107</sup> Oceanosanos. 2021. “La red que arrasa: ¿Qué se hace en Uruguay para combatir la pesca ilegal?” Oceanosanos. Available at: <https://oceanosanos.org/pesca-ilegal-en-uruguay/>

<sup>108</sup> Schaeffer, Daniel. 2021. “Fishing for Security: Taking on Illegal Fishing in Latin America.” Jack D. Gordon Institute for Public Policy. Florida International University. Available at:

[https://digitalcommons.fiu.edu/cgi/viewcontent.cgi?article=1041&context=jgi\\_research](https://digitalcommons.fiu.edu/cgi/viewcontent.cgi?article=1041&context=jgi_research); Oceana. 2021. “Now You See Me, Now You Don’t: Vanishing Vessels Along Argentina’s Waters.” Oceana. Available at: [https://usa.oceana.org/wp-content/uploads/sites/4/2021/06/oceana\\_argentina\\_mini\\_report\\_finalupdated.pdf](https://usa.oceana.org/wp-content/uploads/sites/4/2021/06/oceana_argentina_mini_report_finalupdated.pdf)

<sup>109</sup> InSight Crime, phone interview with Mariana Silvera, consultant for Pristine Seas, 28 Jan. 2022

<sup>110</sup> InSight Crime, phone interview with Mariana Silvera, consultant for Pristine Seas, 28 Jan. 2022

<sup>111</sup> InSight Crime, phone interview with Mariana Silvera, consultant for Pristine Seas, 28 Jan. 2022

<sup>112</sup> N.a. 2021. “La demanda de productos del mar supera la oferta en China.” Pesca Con Ciencia. Available at: <https://www.pescaconciencia.com/2021/07/29/la-demanda-de-productos-del-mar-supera-la-oferta-en-china/>

<sup>113</sup> InSight Crime, phone interview with Roberto Cardoso, prosecretary of SUNTMA, 17 Jan. 2022.

<sup>114</sup> InSight Crime, phone interview with Roberto Cardoso, prosecretary of SUNTMA, 17 Jan. 2022.

<sup>115</sup> InSight Crime, phone interview with Roberto Cardoso, prosecretary of SUNTMA, 17 Jan. 2022.

<sup>116</sup> N.a. 2020. “Serias denuncias por condiciones de trabajo esclavo en buques pesqueros extranjeros que descargan en el puerto de Montevideo.” Pesca Con Ciencia. Available at:

<https://www.pescaconciencia.com/2020/12/03/uruguay-trabajadores-explotados/>

<sup>117</sup> InSight Crime, phone interview with Sergio Almada, coordinator of EICEMAR, 17 Jan. 2022. InSight Crime, phone interview with Gerardo Fernández y Alexis Pintos, Secretary of Artisanal Fishing and Press Secretary for SUNTMA, 28 Jan. 2022; Coricia. 2018. “Death, Drugs, Illegal Fishing and Twin Boats in the Port of Montevideo.”



---

Maritime Herald. Available at: <https://www.maritimeherald.com/2018/death-drugs-illegal-fishing-and-twin-boats-in-the-port-of-montevideo/>

<sup>118</sup> Schwartzman, Milko. 2018. "Illegal, Unreported and Unregulated Fishing in the South Atlantic: Illegal Fishing and Organized Crime." Oceanosanos. Available at: <http://oceanosanos.org/wp-content/uploads/2019/01/OS-Report-0004.pdf>



Western Hemisphere Regional Illegal,  
Unreported, and Unregulated Fishing  
Assessment



Center for Latin American & Latino Studies  
American University  
4400 Massachusetts Ave., NW  
Washington, DC 20016-8137  
[clals@american.edu](mailto:clals@american.edu)  
[www.american.edu/clals](http://www.american.edu/clals)